REMARKS

This Amendment is filed in response to the Final Action of August 21, 2008 in which pending claims 1-38 were rejected.

According to the Final Action the current claim set would not be in order for allowance. The Office Action states that especially the independent claims would be anticipated by *Abram*. Reconsideration is requested based on the following remarks.

Abram seems indeed to disclose a solution for labeling digital image data generated by digital imaging devices with descriptive information generated by the digital imaging device. In addition the digital imaging device may also accept information from a location determination device, such as a GPS system, to be associated with the digital image data.

In more details *Abram* also teaches that user input area 540 may comprise, for example, one or more buttons or scroll wheels for scrolling through the choices until the user's choice is highlighted (e.g. col. 4, lines 21-24).

A very important thing to note is that in doing so, the user is not naming digital image data freely by himself, but the digital imaging device comprises a list of displayed items or even sub items to be displayed to the user so that the user may select an appropriate item from the list (see e.g. col. 4, lines 31-40).

The labeling operation offered by *Abram* is something that the digital imaging device does in a very strict manner, without offering the user any possibility of editing the file names but only offering a list of items prepared beforehand. Computer systems typically require file names to be unique, so if there are more than one, the digital imaging device adds a serial number to each of them, as can be seen in col. 4, lines 41-59. For example, if the user had selected "VACATION" for the subject of the image, the digital imaging device of *Abram* will automatically name the image files as "VACATION_$_{12}$", "VACATION_$_{13}$" and so on (see e.g. col. 4, lines 45-47).

The applicants are honestly of the opinion that the labeling of image files as described by *Abram* is absolutely not done in an editable manner.

Even though the Examiner argues that *Abram* would anticipate "Editable" labeling referring to column 6, lines 38-56, the applicants do not agree with this at all.

Abram clearly discloses (see e.g. col. 6, lines 38-56) that the location coordinates may be compared, for example, to entries in a <u>location</u> **data base stored in memory**. The location <u>data base may contain</u>, for example, global location coordinates and alphanumeric place names such as "Orlando, Fla." or "Manhattan, N.Y." The user then indicates which of the place names should be associated with the particular image file (step 944 of Fig. 9).

This inevitably implies that also the location coordinates as well as the alphanumeric place names must have been <u>stored in memory beforehand</u> and thus the names picked up and displayed by the digital imaging device of *Abram* are only options from which the user has to select an appropriate item. Therefore it is absolutely clear that *Abram* does not offer editable picture file names as is the case with the current invention.

Furthermore the Examiner argues that according to wordnet.princeton.edu, "*edit*" means "*prepare for publication or presentation by correcting, revising, or adapting*". However, it is unclear whether "*correcting, revising, or adapting*" means operation where the user may only select an appropriate choice from a prepared list, as opposed to the full meaning of "edit," where the user may also freely rewrite the proposed name. In the current application the "edit" includes the latter "revising" aspect of the word, as can be seen e.g. from the description page 15, lines 5-7 as filed "*The name suggestion list is presented in a user interface according to an embodiment, and the user may pick the desired suggestion/suggestions or edit the name manually, for instance through the keypad*".

Thus the last step of the current independent claim 1 has therefore been clarified by a minor correction, where

-   the created name suggestion list is displayed in the user interface, where the picture file name is <u>manually</u> editable <u>by the user from the suggested name into another name through a keypad of the mobile station</u>.

Based on the above the applicants believe the "editable" feature of the current independent claims has been clarified by the above minor correction, and request the

Examiner to kindly enter and consider the amendment since it represents merely a minor correction and should be still possible at this stage since applicant believe no further search or substantial consideration is necessary. The other independent claims have been clarified in similar way. Applicants could not have anticipated such an interpretation of the claims and therefore were not able to make the amendment earlier.

The objections and rejections of the Office Action of August 21, 2008, having been obviated by amendment or shown to be inapplicable, withdrawal thereof is requested and passage of claims 1-38 to issue is earnestly solicited.

Respectfully submitted,

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